

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER XIII
	:	
DIVIA D. HAIRSTON	:	1:22-00075
Debtors	:	
<hr/>		
M & T BANK	:	
Movant	:	
	:	
vs.	:	
	:	
DIVIA D. HAIRSTON	:	
Debtor	:	
	:	
MITCHELL THOMAS	:	
TERESA SMITH,	:	
Co-Debtors	:	
And	:	
JACK N. ZAHAROPOULOS,	:	
Trustee	:	

**ANSWER TO MOTION FOR RELIEF**

NOW COMES the Debtor, DIVIA D. HAIRSTON, by and through her attorney, Charles E. Petrie, and respectfully answers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted. Debtor has made or will make all outstanding post-petition payments.
7. Denied. Debtor has made or will make all outstanding post-petition payments.

8. Denied. It is denied that Movant is entitled to relief from the automatic stay.

9. Denied. It is denied that Movant is entitle to reimbursement of legal fees and costs associated with this action.

10. No responsive pleading required.

WHEREFORE, Debtor respectfully requests that Your Honorable Court dismiss Movant's Motion for Relief.

/s/ Charles E. Petrie  
CHARLES E. PETRIE  
3528 Brisban Street  
Harrisburg, PA 17111  
(717) 561-1939  
Attorney for Debtor

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	:	
And	:	
JACK N. ZAHAROPOULOS,	:	
Trustee	:	

**CERTIFICATE OF SERVICE**

I, CHARLES E. PETRIE, ESQUIRE, do hereby certify that on this date, I served a true and correct copy of the within Answer, in the above-captioned matter upon the following individual(s), by United States first-class mail, postage prepaid, addressed as follows, or by electronic means:

REBECCA A. SOLARZ ESQUIRE  
KML LAW GROUP OC  
BNY MELLON INDEPENDENCE CENTER  
701 MARKET STREET SUITE 5000  
PHILADELPHIA, PA 19106

JACK N. ZAHAROPOULOS, ESQUIRE, TRUSTEE  
8125 ADAMS DRIVE SUITE A  
HUMMELSTOWN PA 17036

DATE: 04/22/2022

/s/ Charles E. Petrie  
CHARLES E. PETRIE  
3528 Brisban Street  
Harrisburg, PA 17111  
(717) 561-1939  
Attorney for Debtor  
ID# 29029